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11 UNITED STATES OF AMERICA

12 UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
14 WESTERN DIVISION

15 UNITED STATES OF AMERICA,) No. CV 12-08463-JGB(JCx)
16)
Plaintiff,)
17)
v.) **CONSENT JUDGMENT OF FORFEITURE**
18)
\$20,000.00 IN U.S.)
19 CURRENCY,)
20 Defendant.)
21)
GAYANE GALOYAN and)
22 ARMEN GALOYAN,)
23 Claimants.)
24)
25)

26 On or about October 3, 2012, Plaintiff United States of
27 America ("the government," "the United States of America" or
28 "plaintiff") filed a Complaint for Forfeiture alleging that the

1 defendant \$20,000.00 in U.S. Currency (the "defendant currency") is
2 subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 21
3 U.S.C. § 881(a)(6).

4 Claimants Gayane Galoyan and Armen Galoyan (collectively,
5 "claimants") filed their respective claims to the defendant
6 currency on or about December 20, 2012. No other parties have
7 appeared in this case and the time for filing claims and answers
8 has expired.

9 The government and claimants have now agreed to settle this
10 action without any admission of any wrongdoing and to avoid further
11 litigation by entering into this Consent Judgment of Forfeiture.

12 The Court, having been duly advised of and having considered
13 the matter, and based upon the mutual consent of the parties
14 hereto,

15 IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

16 1. This Court has jurisdiction over the subject matter of
17 this action and the parties to this Consent Judgment of Forfeiture.

18 2. The Complaint for Forfeiture states a claim for relief
19 pursuant to 18 U.S.C. § 981(a)(1)(C) and 21 U.S.C. § 881(a)(6).

20 3. Notice of this action has been given as required by law.
21 No appearances have been made in the litigation by any person other
22 than claimants. The Court deems that all other potential claimants
23 admit the allegations of the Complaint for Forfeiture to be true.

24 4. The sum of \$1,000.00 only (without interest) shall be
25 returned to claimant Gayane Galoyan. The remainder of the
26 defendant currency (i.e., \$19,000.00), plus the interest earned by
27 the United States of America on the defendant currency shall be
28 condemned and forfeited to the United States of America, which

1 shall dispose of those funds in accordance with law.

2 5. The funds to be returned to claimant Gayane Galoyan
3 pursuant to paragraph 4 above shall be paid to claimant Gayane
4 Galoyan by electronic transfer into the client trust account of
5 Jacek W. Lentz, attorney of record for claimants in this case.
6 Claimant Gayane Galoyan (through her attorney Jacek W. Lentz)
7 shall provide all information and complete all documents requested
8 by the United States of America in order for the United States of
9 America to process the transfer including, without limitation,
10 providing claimant's social security and taxpayer identification
11 numbers (if any), and the identity of the bank, the bank's address
12 and the account name, account number, account type and wire
13 transfer routing number for the Jacek W. Lentz trust account to
14 which the transfer of funds is to be made.

15 6. Claimants, and each of them, hereby release the United
16 States of America, its agencies, agents, officers, employees and
17 representatives, including, without limitation, all agents,
18 officers, employees and representatives of the Drug Enforcement
19 Administration and the Department of Justice and their respective
20 agencies, as well as all agents, officers, employees and
21 representatives of any state or local governmental or law
22 enforcement agency involved in the investigation or prosecution of
23 this matter, from any and all claims, actions, or liabilities
24 arising out of or related to this action, including, without
25 limitation, any claim for attorney fees, costs, and interest, which
26 may be asserted by or on behalf of claimants, or either of them.

27 / / /

28 / / /

1 7. The Court finds that there was reasonable cause for the
2 seizure of the defendant currency and institution of these
3 proceedings. This judgment shall be construed as a certificate of
4 reasonable cause pursuant to 28 U.S.C. § 2465.

5 8. The parties hereto shall bear their own attorney fees and
6 costs.

7
8 DATED: 5/6/13



THE HONORABLE JESUS G. BERNAL
UNITED STATES DISTRICT JUDGE

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14 CC: USM -LA

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CONSENT

The parties hereto consent to the above judgment and waive any right of appeal.

DATED: April 15, 2013

ANDRÉ BIROTTE JR.
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/s/ Victor A. Rodgers
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Attorneys for Plaintiff
UNITED STATES OF AMERICA

DATED: April 15, 2013

LAW OFFICES OF JACEK W. LENTZ

/s/ Jacek W. Lentz
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ARMEN GALOYAN